

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

JENNIE CORONA-CANTU, individually
and on behalf of all others similarly situated,

Plaintiff,

v.

INGO MONEY INC.,

Defendant.

Case No. 1:24-cv-03023

Judge Steve C. Jones

**PLAINTIFF'S UNOPPOSED MOTION FOR PRELIMINARY APPROVAL
OF CLASS ACTION SETTLEMENT AND PRELIMINARY
CERTIFICATION OF SETTLEMENT CLASS**

Pursuant to Federal Rule of Civil Procedure Rule 23(e), and subject to Court approval, Plaintiff Jennie Corona-Cantu (“Plaintiff”), individually and on behalf of all others similarly situated, respectfully moves the Court for preliminary approval of the proposed settlement of this class action under Rule 23 of the Federal Rules of Civil Procedure. Unless otherwise indicated, all capitalized terms in Plaintiff’s Memorandum of Law in Support of Unopposed Motion for Preliminary Approval of Class Action Settlement have the same meaning as those in the Settlement Agreement, which is attached as **Exhibit 1** to the *Joint Declaration in Support of Unopposed Motion for Preliminary Approval of Class Action Settlement* (the “Joint Decl.”) being submitted in support of Plaintiff’s Unopposed Motion. Plaintiff hereby moves this Court for an order pursuant to Rule 23(e) of the Federal Rules of Civil Procedure:

- (1) Preliminarily approving the proposed class action settlement with Defendant Ingo Money, Inc.,
- (2) Certifying the Settlement Class;
- (3) Appointing Settlement Class Representative and Settlement Class Counsel;
- (4) Approving Class Notice;
- (5) Scheduling a date for the Final Approval Hearing; and

(6) for such other and further relief as the Court deems just and proper.

In support of this motion, Plaintiff concurrently submits her Memorandum of Law In Support of Plaintiff's Unopposed Motion, the Joint Declaration of Settlement Class Counsel and its exhibits, and a Proposed Order for Preliminary Approval of the Proposed Settlement. For the reasons set forth in the supporting Memorandum of Law, Plaintiff respectfully requests this Court grant her Motion for Preliminary Approval of Class Action Settlement.

Respectfully submitted this 16th day of December, 2024.

/s/ MaryBeth V. Gibson
MaryBeth V. Gibson
Georgia Bar No. 725843
Gibson Consumer Law Group, LLC
4279 Roswell Road
Suite 208-108
Atlanta, GA 30342
Telephone: (678) 642-2503
marybeth@gibsonconsumerlawgroup.com

Tyler J. Bean
SIRI & GLIMSTAD LLP
745 Fifth Avenue, Suite 500
New York, NY 10151
Telephone: (929) 677-5144
tbean@sirillp.com

*Proposed Settlement Class Counsel for
Plaintiff and the Class*

**CERTIFICATE OF SERVICE AND
LOCAL RULE 7.1(D) CERTIFICATION**

I hereby certify that on December 16, 2024, I electronically filed the foregoing with the Clerk of Court using the ECF system, which will send notification of such filing and effectuate service to all counsel of record in this matter, pursuant to Local Rule 5.1.

I further certify that this Motion has been prepared with one of the fonts and point selections approved by the Court in Local Rule 5.1(C).

/s/ MaryBeth V. Gibson
MaryBeth V. Gibson

Settlement Class Counsel